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IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA
IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

DONY PIERRE	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
v.	:	
	:	SEPTEMBER TERM, 2018
CYNDEEQAH A. CARTER	:	
	:	18 5288
MUKESH KUMAR	:	
	:	No. 1291
USA UNIVERSAL HAIR	:	
	:	
ALL AMERICAN CENTRAL LLC	:	
	:	
US MED POINT	:	

NOTICE OF FILING OF REMOVAL

TO: Dony Pierre, Pro Se
35 Walnut Street
Clifton Heights, PA 19018

PLEASE TAKE NOTICE THAT on December 7, 2018, defendants, All American
Central LLC and Mukesh Kumar filed, in the office of the Clerk of the United States District
Court for the Eastern District of Pennsylvania a verified Notice of Removal.

A copy of this Notice of Removal is attached hereto and is also being filed with the Clerk
of the Court of Common Pleas of Philadelphia Country, pursuant to Title 28, United States Code,
Section 1446.


Ying Zhou, Esquire
Attorney I.D. No. 88761

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ALL AMERICAN CENTRAL LLC	:	FILED
US MED POINT	:	DEC 07 2018

KATE BARKMAN, Clerk
Dep. Clerk**NOTICE OF REMOVAL**

To the Honorable Judges of the United States District Court for the Eastern District of Pennsylvania

Pursuant to 28 U.S.C. §1441, defendants, All American Central LLC and Mukesh Kumar, (hereinafter “petitioners”) through their counsel, Ying Zhou, Esquire, respectfully petition for the removal of this action to the United States District Court for the Eastern District of Pennsylvania. In support thereof, defendants state the following:

1. On September 12, 2018, plaintiff, a resident of Pennsylvania, initiated this action by filing a Complaint in the Court of Common Pleas in Philadelphia, September Term, 2018, No. 1291. (Exhibit A – Complaint).
2. Subsequently, said Complaint was served on petitioners via certified mail at their principal place of business at 101 North Lake Avenue, Worcester, MA 01605.
3. Plaintiff alleges that he had sustained damages due to defendants’ violations of the following federal statutes: Telephone Consumer Protection Act, 47 U.S.C. §227 et. seq.,

Federal Communications Commission's rules restricting telemarketing, telephone solicitation and facsimile advertising, 47 CFR, §64.1200 et. seq., and Telemarketing Sales Rules (implementing the Telemarketing and Consumer Fraud and Abuse Prevention Act, 15 U.S.C. §§6101-6108), 16 C.F.R. 310.1 et. seq.

4. This action may be removed to this Court pursuant to 28 U.S.C. §1441 as it meets the federal question jurisdictional threshold of 28 U.S.C. §1331, and separately and independently, it can also be removed under 28 U.S.C. §1332 as the plaintiff and all the defendants are citizens of different states and the amount in controversy is the money judgment demanded in excess of \$50,000 which meets the requirement of 28 U.S.C. §1446(c)(2)(A)(ii) as the state court permits recovery in excess of the amount demanded.

WHEREFORE, petitioners, All American Central LLC and Mukesh Kumar, respectfully request that the captioned Complaint be removed to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,


Ying Zhou, Esquire
Attorney I.D. No. 88761
Law Office of Ying Zhou, PLLC
1700 Market Street, Suite 1005
Philadelphia, PA 19103
(215) 477-1888
Attorney for Defendants

Dated: 12/7/18

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DONY PIERRE

COURT OF COMMON PLEAS
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FILED

DEC 07 2018

KATE BARKMAN, Clerk
By _____ Dep. Clerk

CERTIFICATE OF SERVICE

I, Ying Zhou, Esquire, do hereby certify that a true and correct copy of the attached Notice of Removal has been served upon the Plaintiff by certified mail with return receipt requested, postage prepaid, on the date indicated below:

TO: **Dony Pierre**
35 Walnut Street
Clifton Heights, PA 19018


Ying Zhou, Esquire
Attorney ID No. 88761
Law Office of Ying Zhou, PLI.C
1700 Market Street, Suite 1005
Philadelphia, PA 19103
(215) 477-1888

Date: 12/7/18